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	<b>EXHIBIT</b>	$\mathbf{A}$	

### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

HANS A. QUAAK, ATTILIO PO and KARL LEIBINGER, on behalf of themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., SA),

Defendant.

STONINGTON PARTNERS, INC., a Delaware Corporation, STONINGTON CAPITAL APPRECIATION 1994 FUND L.P., a Delaware Partnership and STONINGTON HOLDINGS, L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., SA),

Defendants.

GARY B. FILLER and LAWRENCE PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., SA),

Defendants.

No.: 03-CV-11566 (PBS)

No.: 04-CV-10411 (PBS)

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., SA),

Defendants.

No.: 04-CV-10501 (PBS)

# AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION OF <u>DEFENDANT DEXIA BANK BELGIUM</u>

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, and prior orders issued by the Court in the above-captioned actions, Plaintiffs, by their attorneys, will take the deposition upon oral examination, before a notary public or other person authorized to administer oaths, or as otherwise stipulated by the parties, of Dexia Bank Belgium, commencing on June 12, 2006, at 9:00 a.m. and continuing from day-to-day thereafter until completed, at the offices of Marx van Ranst Vermeesch & Partners, 270 Avenue de Terveuren/Tervureenlaan, 1150 Brussels, Belgium.

The deponent is hereby advised of its duty to designate a person or persons to testify on its behalf as to the matters of examination listed below, and of its obligation to ensure that the person or persons so designated have the ability to testify as to matters known or reasonably available to the organization.

**PLEASE TAKE FURTHER NOTICE** that the deposition will be recorded by stenographic means and videotaped.

### **DEFINITIONS**

All definitions and rules of instructions set forth in Fed. R. Civ. P. 26 and 34 shall apply herein, as well as the following additional definitions:

"Concerning" means relating to, referring to, describing, evidencing, or constituting.

"Dexia" means Dexia Bank Belgium and includes any of its present or former branches, divisions, subsidiaries, affiliates and predecessors (including, without limitation, Artesia Banking Corporation., S.A. and any of its branches, divisions, subsidiaries, affiliates and predecessors (including, without limitation, Artesia Securities, S.A., Paribas Banque Belgium, and Bacob Bank C.V.)), its parent corporation Dexia, S.A., and the current and/or former officers, directors, employees, servants, and agents of any of the foregoing entities.

"FLV Fund" means Flanders Language Valley Fund, c.v.a., including FLV Fund Management and FLV Management USA and any branches, divisions, subsidiaries, officers, directors, trustees, partners, members, employees, servants, and agents of any of these entities.

"L&H" means Lernout & Hauspie Speech Products, N.V. and includes any of its present or former branches, divisions, subsidiaries, affiliates, predecessors, and the former officers, directors, employees, servants, and agents of any of the foregoing entities.

"Security" or "securities" has the meaning ascribed to it under the Securities Act of 1933 (including any equity, debt, investments, or contracts).

"LHIC" means L&H Investment Co., NV, and any branches, divisions, subsidiaries, officers, directors, servants and agents thereof.

"L&H Korea" means the Korean division or subsidiary of L&H, and any of L&H Korea's current or former officers, directors, employees and agents.

### **RELEVANT TIME PERIOD**

Unless otherwise indicated, the Relevant Time Period is January 1, 1996, through and including December 31, 2000.

### AREAS FOR EXAMINATION

Pursuant to Rule 30(b)(6), the following subject matters are specified for examination:

- 1. The circumstances of each of Dexia's acquisitions and sales of L&H securities; the bases for Dexia's decisions to enter into each of these transactions including the information considered, and the considerations determining the timing of each of these transactions.
- 2. Dexia's underwriting of, participation in, or assistance with any public or private offering of L&H securities.
- The relationship between Artesia Banking Corporation, S.A., on the one hand, 3. and Artesia Securities, S.A. and Cordius Asset Management, on the other hand, including (i) the extent to which Artesia Banking Corporation, S.A.'s management exerted any control over either Artesia Securities, S.A. or Cordius Asset Management; and (ii) the extent to which the management, personnel, customers, accounts, e-mail systems, computer systems, office facilities, and business activities of either Artesia Securities, S.A. or Cordius Asset Management were common to or overlapped with those of Artesia Banking Corporation, S.A.
- 4. The preparation of, and issuance by, Artesia Securities, S.A. and/or Cordius Asset Management of analysts reports concerning L&H including (i) the initiation of analyst report coverage of L&H securities; (ii) the research and drafting of such analyst reports; (iii) the determination of the recommendation (e.g., buy or sell) to be placed by analysts on any particular or security; and (iv) the extent and nature of control over, or coordination of, the content of such analysts reports by Artesia Banking Corporation, S.A.
- 5. The policies, practices, processes, plans, guidelines, and procedures used by Artesia Banking Corporation, S.A. (including its predecessors Paribas Banque Belgium and Bacob Bank C.V.) regarding credit default swap transactions for the time period 1997 through 1999.

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- 6. The due diligence of Artesia Banking Corporation, S.A. performed by or on behalf of Dexia in connection with Dexia's acquisition of Artesia Banking Corporation, S.A. in so far as such due diligence related to loans to, or accounts of, L&H (including L&H Korea), Jo Lernout, Pol Hauspie, Nico Willaert, Gaston Bastiaens, Dictation Consortium, N.V., Brussels Translation Group, Radial Belgium N.V., Language Investment Company, Document Management Partners, or any entity in the "L&H Group".
- 7. Dexia's record keeping procedures applicable to its regularly conducted business activities, and Dexia's records of acts, events, conditions or opinions made at or near the time by, or from information transmitted by, persons with knowledge, and kept as part of the regular practice of Dexia's business activities and in the regular course of those business activities concerning Dexia's loans to: L&H, Jo Lernout, Pol Hauspie, Nico Willaert, Gaston Bastiaens, Dictation Consortium, N.V., Brussels Translation Group, Radial Belgium N.V., Language Investment Company, Document Management Partners, and all entities in the "L&H Group".
- Dexia's statute of limitations defense, including (i) the facts that Dexia contends 8. placed Plaintiffs on notice that they had a valid claim for a violation of Section 10(b) of the Securities and Exchange Act of 1934 including, without limitation, the facts that Dexia contends apprised Plaintiffs in connection with their purchases of L&H securities; (ii) when those facts were available to Plaintiffs; (iii) how Plaintiffs should have discovered those facts; and (iv) Dexia's responses to Class Plaintiffs' Interrogatories Nos. 8 and 9.

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Dated: May 10, 2006

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### **Certificate of Service**

I hereby certify that on May 10, 2006, I caused a true copy of the foregoing *Plaintiffs*' Amended Notice of Rule 30(b)(6) Deposition of Defendant Dexia Bank Belgium dated May 10, 2006 to be served by electronic mail and First Class Mail, postage prepaid, upon the following Counsel of Record at the electronic and postal addresses indicated below:

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> /s/ Susan M. Davies Susan M. Davies, N.Y. Atty Reg. #2413508